

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

In re:	)	Judge Russ Kendig
	)	Chapter 7
Sondra Jean Knotts	)	Case No. 13-62507
	)	
Debtor.	)	<b>MOTION TO REDEEM</b>

Now come Debtors, Sondra Jean Knotts, by and through counsel, Nicole L. Rohr, and hereby move to redeem tangible personal property pursuant to 11 U.S.C. § 722 and Federal Rule of Bankruptcy Procedure 6008. The item to be redeemed is a 2000 Chrysler Grand Voyager, intended primarily for personal, family or household use.

Debtors filed a petition under Chapter 13 of Title 11 of the United States Code on October 11, 2013. Debtor's plan was confirmed on 02/13/2014 establishing a cram down value of \$750.00 for the 2000 Chrysler Grand Voyager. Listed in Schedule D was a debt owing Springfield Financial Service in the amount of \$2,911.00. The debt to Springfield Financial Service is secured by the 2000 Chrysler Grand Voyager. The Debtors paid in full the \$750.00 plus interest prior to the conversion of this case to a chapter 7 on March 5, 2016.

Pursuant to 11 U.S.C. § 722, the interest of the Debtor in the vehicle is either exempt under 11 U.S.C. § 522 and/or the property has been abandoned under 11 U.S.C. § 554. Further, the debt is a dischargeable consumer debt within the meaning of § 722.

The allowed secured value of Springleaf Financial Service for the purposes of redemption, the "redemption value," should be determined to be not more than \$750.00 which was determined to be the replacement value in the chapter 13 case. The Debtors have already paid the aforesaid amount in the Chapter 13 case. Should this motion be granted, Huntington Bank shall forward to the Debtors within 30 days their title without any further payment to be made.

Wherefore, Debtors request the Court enter an order approving Debtor's motion to redeem the vehicle; order Springleaf Financial Service to accept the payments in the Chapter 13 as full satisfaction of the redemption value; and order release of Springleaf Financial Service's lien. Debtors also pray for such other relief as may be just and appropriate.

Respectfully Submitted:

/s/Nicole L. Rohr  
Nicole L. Rohr (#0078316)  
Thrush & Rohr, L.L.C.

4410 22<sup>nd</sup> Street NW  
Canton, Ohio 44708  
(330) 479-9494  
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Counsel for Debtor

**UNITED STATES BANKRUPTCY COURT  
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	)	Chapter 7
Sondra Jean Knotts	)	Judge Russ Kendig
	)	
Debtor.	)	

**NOTICE OF MOTION TO REDEEM**

Debtors have filed a motion to redeem tangible personal property in this bankruptcy case.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have any attorney, you may wish to consult one.)**

If you do not want the court to grant the relief requested, or if you want the court to consider your views on the motion, then on or before **April 25, 2016** you or your attorney must:

File with the court a written response, explaining your position, and request a hearing, at:

United States Bankruptcy Court,  
Ralph Regula Federal Building,  
401 McKinley Avenue SW,  
Canton, Ohio 44702

If you mail your response to the court for filing, you must mail it early enough so that the court will **receive** it on or before the date state above.

You must also mail a copy to:

Nicole L. Rohr  
Thrush & Rohr, L.L.C.  
4410 22<sup>nd</sup> Street NW  
Canton, Ohio 44708

If you or your attorney do not take these steps, the court may decide that you do

not oppose the relief sought in the motion and may enter an order granting that relief.

Date: March 25, 2016

Signature: /s/Nicole L. Rohr

Name: Nicole L. Rohr

4410 22<sup>nd</sup> Street NW

Canton, Ohio 44708

### **CERTIFICATE OF SERVICE**

I certify that on March 25, 2016, a true and correct copy of Debtor's Motion to Redeem was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

- Patti H. Bass    ecf@bass-associates.com
- Amy M Blythe    bankruptcy@carlisle-law.com, bankruptcy@carlisle-law.com
- Amy M. Blythe    bankruptcy@carlisle-law.com
- Richard S. Ralston    chapter-13@w-legal.com, angelan@w-legal.com
- Nicole L. Rohr    nicole@thrushandrohr.com,  
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- Toby L Rosen    trosen@chapter13canton.com, trosen@ecf.epiqsystems.com
- Beth Ann Schenz    bkecf@huntington.com
- United States Trustee    (Registered address)@usdoj.gov

And by Regular Mail:

Springleaf Financial Service Inc

PO Box 3251

Evansville IN 47731-3251

/s/Nicole L. Rohr

Nicole L. Rohr

Attorney for Debtors